

# Monsanto

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MONSANTO CHEMICAL INTERMEDIATES CO.  
Sauget, Illinois 62201  
Phone: (618) 271-5835

August 9, 1982


Sam McWilliams	-	Edwin Cooper, Inc.
Robert C. Reinhardt	-	Midwest Rubber Co.
Paul Tandler	-	Cerro Copper Products Co.
Ralph Wigger	-	Amax Zinc Co., Inc.
William A. Wilkinson	-	Pfizer, Inc.

Attached is a note I just received from the U.S. EPA highlighting Federal pretreatment requirements for industries presently discharging into the Village of Sauget's treatment plant. This note does give us their general commitment for pretreatment credits and highlights the pretreatment uniqueness feature of the existing chemical treatment facility.

The key item behind this letter is the verbal commitments made through the Directors of the Water Permit Section of U.S. EPA in Chicago, and Illinois EPA in Springfield, indicating their full commitment to considering the Regional and the Chemical treatment plant for any pretreatment requirements associated with any of our individual facilities.

Should you have any questions on this, let me know.

Sincerely,

  
Jack W. Molloy

JWM/ap

Attachment:

cc: Harold G. Baker, Atty.



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY

REGION V  
230 SOUTH DEARBORN ST  
CHICAGO, ILLINOIS 60604

215ED0011 1982

REPLY TO ATTENTION OF:

5WQP-26

AUG 4 1982

Mr. Jack Molloy  
Chairman, Sauget Research and  
Development Association  
Monsanto Company  
W.G. Krummrich Plant  
Sauget, Illinois 62201

Dear Mr. Molloy:

As requested in your June 29, 1982, phone call to Mr. Tony Holoska of my staff, this letter will highlight Federal pretreatment requirements for industries presently discharging into the Village of Sauget's treatment plant, and for those who will, in the future, be discharging into the American Bottoms Regional Treatment Plant.

The General Pretreatment Regulations (40 CFR 403) as amended on March 31, 1981, established two different sets of standards that industries must comply with: national categorical standards and prohibitive standards. The U.S. Environmental Protection Agency (U.S. EPA), pursuant to the settlement of the Natural Resources Defense Council suit, must publish standards for certain types of industries determined to discharge toxicants. These standards apply nationally and are based on Best Available Technology (BAT). Section 307(b)(1) of the Clean Water Act provides for case-by-case revisions of categorical pretreatment standards for industrial users to compensate for pollutants removed and treated by a Publicly-Owned Treatment Works (POTW). A POTW must demonstrate consistent removal and apply to the U.S. EPA Regional Office or to an NPDES state with pretreatment authority.

Presently, compliance with BAT categorical pretreatment standard is required as of 3 years from the promulgation date of the standard, but no later than July 1, 1984. Once a standard is promulgated, affected industries must also comply with reporting requirements, as specified in 40 CFR 403.12. There exist federally promulgated BAT categorical standards for Timber Products Processing, Iron and Steel, and the Inorganic Chemicals industry, with 12 others proposed (see Attachment for list of industrial categories for which BAT categorical pretreatment standards will be promulgated). Additionally, Best Practicable Control Technology (BPT) electroplating standards are in effect.

Whereas categorical standards apply to specific classes of industries, national prohibitive standards apply to all nondomestic users of a POTW. Section 403.5 of the General Pretreatment Regulations contains requirements

Exhibit III

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for the nondomestic users and the municipality. Pursuant to 40 CFR 403.5(c), a POTW, developing a pretreatment program must establish specific limitations in its sewer use ordinance to control pollutants, particularly toxicants, from nondomestic users.

In order to establish these limits, a municipality must conduct an industrial survey to determine the type of pollutants that could enter the sewer system. This activity is followed by the POTW sampling its influent, effluent, and sludges to determine the fate of toxicants. Limits established will be based on local situations with the overall objective being prevention of pass-through of pollutants, prevention of treatment plant interference and upset, and reduction of sludge contamination. Proposed local limits and their technical justification must be approved by the state and/or U.S. EPA.

Once the POTW pretreatment program is approved, the local entity will enforce its own standards as described in its sewer use ordinance, or federally promulgated BAT categorical pretreatment standards, whichever are more stringent. Cities will need to work very closely with their industries and keep them apprised of the applicable standards. Industries having to meet more stringent local standards are not bound by a federal compliance deadline date.

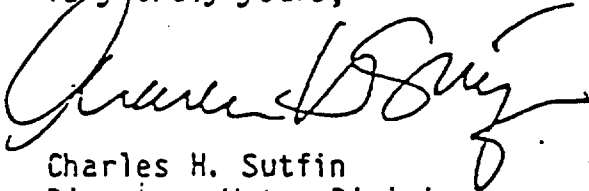
Reauthorization of the Clean Water Act is currently under review by Congress. A major part of the legislation proposed by U.S. EPA is modification to the national pretreatment program. Two sections dealing with industrial compliance with categorical pretreatment standards are Sections 307(b)(2) and (b)(3). Section 307(b)(2) would allow the Administrator discretion in promulgating national categorical BAT pretreatment standards. Section 307(b)(3) would allow a POTW, under certain conditions, to apply for a waiver from having to apply national categorical standards to its nondomestic users.

In conclusion, this office is very interested in the Regional Treatment Plant being constructed. We feel the new plant will have the capability to remove and treat some of the toxicants which are presently entering the Village of Sauget's treatment plant. Also, the Sauget physical/chemical treatment facility provides a unique pretreatment feature that coordinates industrial pretreatment with the regional wastewater facility. The operational success of the Regional Treatment Plant, we believe, will depend primarily on the effectiveness of the combined capabilities of these treatment facilities and the overall effective management of the regional pretreatment program. (The development of the Village of Sauget's and the American Bottoms Regional Association's pretreatment program has been reviewed and comments will be forwarded to the Illinois Environmental Protection Agency for their review).

I trust that this letter has provided you with an understanding of the present and future responsibilities of industrial facilities connected to the Sauget treatment plant and those industries who will be users of the Regional Treatment Plant.

Any questions regarding the subject matter should be directed to Bob Robichaud  
(312) 353-2105, Regional Pretreatment Coordinator.

Very truly yours,



Charles H. Sutfin  
Director, Water Division

Attachment

cc: Roger Kanerva, IEPA  
Eugene Seebald, IEPA  
Paul Sauget, Village of Sauget

EFFLUENT GUIDELINES  
REGULATORY CALENDAR AS OF  
7/1/82

Industrial Category*	Proposal		Promulgation	
	Scheduled	Actual	Scheduled	Actual
Adhesives & Sealants. . . . .	2/83	--	11/83	--
Aluminum Forming. . . . .	11/82	--	7/83	--
Battery Manufacturing . . . . .	10/82	--	6/83	--
Coal Mining . . . . .	--	1/13/81&5/29/81	9/82	--
Coil Coating. . . . .	--	1/12/81	11/82	--
Coil Coating (Canmaking). . . . .	1/83	--	10/83	--
Copper Forming. . . . .	11/82	--	8/83	--
Elec.&Electron.Prods.(Phase I). . . . .	8/82	--	3/83	--
Elec.&Electron.Prods.(Phase II) . . . . .	2/83	--	11/83	--
Foundries . . . . .	10/82	--	8/83	--
Inorganic Chemicals (Phase I) . . . . .	--	7/24/80	--	6/29/82
Inorganic Chemicals (Phase II). . . . .	9/83	--	6/84	--
Iron & Steel Manufacturing. . . . .	--	1/7/81	--	5/27/82
Leather Tanning & Finishing . . . . .	--	7/2/79	11/82	--
Metal Finishing (Electro- plating + Mechanical Products) . . . . .	8/82	--	6/83	--
Nonferrous (Phase I). . . . .	1/83	--	1/84	--
Nonferrous (Phase II) . . . . .	9/83	--	6/84	--
Nonferrous Forming. . . . .	9/83	--	6/84	--
Oré Mining & Dressing . . . . .	--	6/14/82	11/82	--
Organic Chemicals (Phase I) . . . . .	2/83	--	3/84	--
Pesticides. . . . .	11/82	--	12/83	--
Petroleum Refining. . . . .	--	12/21/79	9/82	--
Pharmaceuticals . . . . .	11/82	--	9/83	--
Plastics & Synthetics . . . . .	2/83	--	3/84	--
Plastics Molding & Forming. . . . .	10/83	--	6/84	--
Porcelain Enameling . . . . .	--	1/27/81	11/82	--
Pulp and Paper. . . . .	--	1/6/81	10/82	--
Steam Electric. . . . .	--	10/14/80	11/82	--
Textile Mills . . . . .	--	10/29/79	8/82	--
Timber Products Processing. . . . .	--	10/31/79	--	1/26/81 <sup>b</sup>